## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION

Master File No. 2:12-MD-02327 MDL 2327

-----

ETHICON WAVE 2 CASES LISTED IN EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

## NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF MARC TOGLIA, M.D. FOR WAVE 2

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion filed against Marc Toglia for Ethicon Wave 1, Dkt. 2023 (motion), 2028 (memorandum in support). Plaintiffs respectfully request that the Court exclude Marc Toglia's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 2 cases identified in Exhibit A attached hereto.

Dated: July 21, 2016 Respectfully submitted,

/s/ D. Renee Baggett

Bryan F. Aylstock, Esq.
Renee Baggett, Esq.
Aylstock, Witkin, Kreis and Overholtz, PLC
17 East Main Street, Suite 200
Pensacola, Florida 32563
(850) 202-1010
(850) 916-7449 (fax)

E-mail: rbaggett@awkolaw.com

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL Wagstaff & Cartmell LLP 4740 Grand Avenue, Suite 300 Kansas City, MO 64112 816-701-1102 Fax 816-531-2372 tcartmell@wcllp.com

## **EXHIBIT A**

Brown, Valerie	2:12-cv-01489

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 21, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett
D. RENEE BAGGETT
Aylstock, Witkin, Kreis and Overholtz, PLC
17 E. Main Street, Suite 200
Pensacola, FL 32563
850-202-1010
850-916-7449
Rbaggett@awkolaw.com